

Jeffrey L. Kessler (admitted *pro hac vice*)
jkessler@winston.com

David G. Feher (admitted *pro hac vice*)
dfeher@winston.com

WINSTON & STRAWN LLP

200 Park Avenue
New York, New York 10166
Telephone: (212) 294- 6700
Facsimile: (212) 294-4700

Cardelle B. Spangler (admitted *pro hac vice*)
cspangler@winston.com

WINSTON & STRAWN LLP

35 West Wacker Drive
Chicago, Illinois 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700

Diana Hughes Leiden (SBN: 267606)
dhleiden@winston.com

WINSTON & STRAWN LLP

333 South Grand Avenue, 38th Floor
Los Angeles, CA 90071-1543
Telephone: (213) 615-1700
Facsimile: (213) 615-1750

Jeanifer E. Parsigian (SBN: 289001)
jparsigian@winston.com

WINSTON & STRAWN LLP

101 California St., 35th Floor
San Francisco, California 94111
Telephone: (415) 591-1000
Facsimile: (415) 591-1400

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

ALEX MORGAN, et al.,

Plaintiffs/Claimants,

v.

UNITED STATES SOCCER
FEDERATION, INC.,

Defendant/Respondent.

Case No. 2:19-cv-01717-RGK-AGR

Assigned to: Judge R. Gary Klausner

**DECLARATION OF ALEX MORGAN
IN SUPPORT OF PLAINTIFFS' REPLY
IN SUPPORT OF MOTION FOR
CLASS CERTIFICATION**

Date: October 21, 2019

Time: 9:00 A.M.

Place: Courtroom 850

1 I, Alex Morgan, declare as follows:

2 1. I am over the age of 18. If called upon to testify, I could and would
3 competently testify to the matters set forth in this declaration.

4 2. I have been a member of the WNT continuously since 2010.

5 3. The WNT players have played more games on an inferior surface of play,
6 artificial turf, than the MNT players. For example, from January 1, 2014 through
7 December 31, 2017, the WNT players played 62 domestic games, including games for
8 the World Cup and Olympic qualifiers. 13 of the 62 games (about 21%) were played on
9 artificial turf. For only 1 game was natural grass temporarily installed over a venue
10 with artificial turf. Over the same time period, the MNT played 32 domestic matches,
11 with 0 on artificial turf and 7 where natural grass was installed over a venue with
12 artificial turf.

13 4. I currently play for the Orlando Pride in the National Women's Soccer
14 League ("NWSL"). In 2017, I played for Olympique Lyonnais in the Division I French
15 League. My employment with any domestic or foreign professional team is a separate
16 job from my national team employment with the USSF. This is the same for any WNT
17 player.

18


19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed on this 5th day of October, 2019.

21

22

23



Alex Morgan

24

25

26

27

28